

Office: (718) 878-3781 • Facsimile: (212) 748-1606 • Info@TsiglerLaw.com • www.TsiglerLaw.com 299 Broadway, Suite 1400, New York, NY, 10007

October 23, 2024

MEMO ENDORSEMENT.

Hon. Lewis J. Liman So ordered. Pretrial services is ordered to return the passport to Ms. Sabess or her authorized representative.

10/23/2024 SO ORDERED.

LEWIS J. LIMAN
United States District Indee

RE: United States v. Nirvani Sabess Case No.: 1:23-cr-00371-LJL-1

Request for an Order Releasing Defendant's Passport

Dear Judge Liman:

500 Pearl St.

United States Courthouse

New York, NY 10007-1312

I write to request that Your Honor issue an order directing the United States Pretrial Services Office in the Southern District of New York (USPTSO/SDNY) to release Ms. Nirvani Sabess' passport to her or a named representative from our office.

Ms. Sabess' passport was initially surrendered to Pretrial Services during the pendency of her criminal case. See <u>Appearance Bond</u>, ECF No. 5 at 4. On November 20, 2023, Ms. Sabess received a sentence of two months imprisonment followed by 3 years of supervised release, which is currently being monitored in the District of New Jersey, where she resides. ECF No. 31, <u>Judgment in a Criminal Case</u>.

By email dated October 22, 2024, U.S. Pretrial Services Officer Vanessa Perdomo informed my office that Ms. Sabess' passport is presently in their possession. As per that office's policy, a court order is needed before Pretrial will release the passport back to her. Since this criminal matter has been concluded, there is no further need to retain it. We have communicated with the government concerning this request and have received no response yet.

Accordingly, we respectfully request that the Court issue an order directing U.S. Pretrial Services (SDNY), to release Ms. Sabess' passport to her or a named representative from our office. Thank you for your attention and consideration in this matter.

Case 1:23-cr-00371-LJL Document 42 Filed 10/23/24 Page 2 of 2

Hon. Lewis J. Liman - pg. 2 U.S. v. Nirvani Sabess, 1:23-cr-00371-LJL-1 October 23, 2024

Respectfully,

/s/ Scott Migden

Scott Migden, Associate Attorney Direct: (718) 701-5405 sm@tsiglerlaw.com

cc: AUSA Adam Sasan Sowlati (via ECF)

USPTSO Vanessa Perdomo (by email, vanessa_perdomo@nyspt.uscourts.gov)